

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<u>In re</u>	:	Chapter 11 Case No.
	:	08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., et al.	:	
	:	
Debtors.	:	
	:	
	x	

**RESPONSE TO THREE HUNDRED SIXTH
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Fedor and Fedor, Claimants, hereby respond to the Three Hundred Sixth Omnibus Objection to Claims dated June 4, 2012 as follows.

This claim relates to legal defense work performed on behalf of an E.F. Hutton & Co. registered representative during 1990-1991. E.F. Hutton was responsible for the payment of the legal fees and expenses. In 1984, Shearson/American Express acquired Lehman Brothers. In 1988, Shearson Lehman/American Express merged with E.F. Hutton & Co. to become Shearson Lehman Hutton. As part of the merger the combined entity, Shearson Lehman Hutton, assumed responsibility for the legal expenses attributable to E.F. Hutton. The defense work related to allegations that occurred in 1987-1988 even though the work itself was performed later. Despite regular billing requests and invoices, the legal bill remained unpaid.

In 1994, American Express spun off Lehman Brothers Kuhn Loeb in an Initial Public Offering as Lehman Brothers Holdings, Inc. The new subsequent entity, Lehman Brothers, assumed liability for our accrued legal expenses as part of the IPO process. Again, regular monthly billing invoices were sent to Lehman Brothers. Several times promises of payment were made by Lehman Brothers bills payable accountants and executives. Despite our numerous requests, Lehman Brothers never paid the bill. Frustrated, we finally addressed the invoice to Richard S. Fuld, Jr., Chairman and CEO of Lehman Brothers. Once again, promises of payment were made by Lehman Brothers employees, but no such payment occurred. In 2008, Lehman Brothers filed for Chapter 11 bankruptcy and we filed an appropriate claim for the unpaid legal fees.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Chapter 11 Case No.
08-13555 (JMP)

LEHMAN BROTHERS HOLDINGS INC., et al.

Debtors.

RESPONSE TO THREE HUNDRED SIXTY

OBJECTION TO CLAIM (FILED IN CASE NO. 08-13555)

Fedor and Fedor, Claimants, hereby respond to the Three Hundred Sixty

Objection to Claim dated June 4, 2012 as follows.

This claim relates to legal defense work performed on behalf of an E.F. Hutton & Co. registered representative during 1900-1991. E.F. Hutton was responsible for the payment of the legal fees and expenses. In 1984, Shearson/American Express acquired Lehman Brothers. In 1988, Shearson Lehman/American Express merged with E.F. Hutton & Co. to become Shearson Lehman Hutton. As part of the merger the combined entity, Shearson Lehman Hutton, assumed responsibility for the legal expenses attributable to E.F. Hutton. The defense work related to allegations that occurred in 1987-1988 even though the work itself was performed later. Despite regular billing requests and invoices, the legal bill remained unpaid. In 1994, American Express spun off Lehman Brothers E.F. Hutton in an initial public offering and the new company, although it is the new company, assumed the debt, assumed liability for the accrued legal expenses as part of the IPO process. Again, regular monthly billing invoices were sent to Lehman Brothers. Several times promises of payment were made by Lehman Brothers bills payable accountants and executives. Despite our numerous requests, Lehman Brothers never paid the bill. Instead, we finally addressed the invoice to Richard S. Fuld, Jr., Chairman and CEO of Lehman Brothers. Once again, promises of payment were made by Lehman Brothers employees but no such payment occurred. In 2008, Lehman Brothers filed for Chapter 11 bankruptcy and we filed an appropriate claim for the unpaid legal fees.

WHEREFORE, Fedor and Fedor request that their claim be re-instated,
that all objections be removed and that they be paid according to the bankruptcy plan.

Dated: June 22, 2012
Asheville, NC



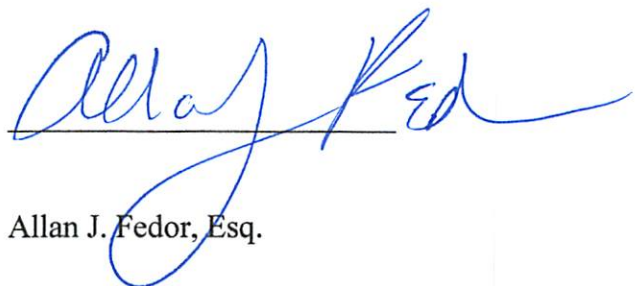
/S/ Allan J. Fedor, Esq.

FEDOR & FEDOR
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Claimants

CERTIFICATION OF SERVICE

I hereby certify that the foregoing was served by mailing via regular U.S. Mail a 3.5 inch disk to the Bankruptcy Court [with a hard copy sent by regular U.S. Mail to the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601] and by mailing a hard copy via regular U.S Mail Attn: to Jacqueline Marcus, Esq., Roberts J. Lemons, Esq. and Mark Bernstein, Esq. Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 and Attn: to Tracy Hope Davis, Esq., Elizabetha Gasparini, Esq. and Andrea B. Schwartz, Esq., Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 this 22nd day of June, 2012.



Allan J. Fedor, Esq.

